

RONALD L. JOHNSTON (State Bar No. 057418)
ronald.johnston@aporter.com
ANGEL L. TANG (State Bar No. 205396)
angel.tang@aporter.com
ARNOLD & PORTER LLP
777 South Figueroa Street, 44th Floor
Los Angeles, California 90017-5844
Telephone: (213) 243-4000
Facsimile: (213) 243-4199

JAMES COOPER (admitted *pro hac vice*)
james.cooper@aporter.com
LAURA RIPOSO VANDRUFF (admitted *pro hac vice*)
Laura.riposo.vandruff@aporter.com
ARNOLD & PORTER LLP
555 Twelfth Street, N.W.
Washington, D.C. 20004-1206
Telephone: (202) 942-5000
Facsimile: (202) 942-5999

Attorneys for Defendants VeriSign, Inc. and m-Qube, Inc.

WILLIAM M. AUDET (State Bar No. 117456)
waudet@audetlaw.com
ADEL A. NADJI (State Bar No. 232599)
anadji@audetlaw.com
AUDET & PARTNERS, LLP
221 Main Street, Suite 1460
San Francisco, CA 94105
Telephone: (415) 568-2555
Facsimile: (415) 568-2556

Attorneys for Plaintiff Babak Pishvae

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BABAK PISHVAEE, individually, and on)
behalf of a class of similarly situated)
individuals,)
)
Plaintiff,)
)
v.)
)
VERISIGN, INC., a California corporation,)
and M-QUBE, INC., a Delaware corporation.)
)
Defendants.)

Case No. C-07-3407 PVT

**STIPULATION CONTINUING INITIAL
CASE MANAGEMENT CONFERENCE
AND ADR DEADLINES; [PROPOSED]
ORDER**

Defendants VeriSign, Inc. and m-Qube, Inc. (collectively "Defendants") and plaintiff Babak Pishvaei ("Plaintiff"), through their respective counsel of record, pursuant to Local Rule 6-1, hereby stipulate and agree as follows based on the following facts:

(1) On June 28, 2007, Plaintiff served Defendants with the original complaint in this action.

(2) On June 28, 2007, this Court issued its Order Setting Initial Case Management Conference and ADR Deadlines. The deadlines set forth in that Order are detailed in paragraph 4 below. [Docket No. 2].

(3) On August 24, 2007, during a meet and confer session to discuss the issues raised in Defendants' intended motions to dismiss the original complaint, the parties reached the following agreements: (1) Defendants will not be required to respond to the original complaint, as Plaintiff will be filing a first amended complaint; (2) Plaintiff shall file a first amended complaint no later than September 21, 2007; and (3) Defendants shall file their respective responsive pleadings to the first amended complaint no later than November 20, 2007. On August 24, 2007, the parties filed with the Court a joint stipulation reflecting the above agreements. [Docket No. 12].

(4) Given Plaintiff's intention to amend her complaint, and Defendants' revised responsive pleading deadline, the parties have agreed to continue the Case Management Conference and ADR deadlines as follows:

EVENT	ORIGINAL DEADLINE	REVISED DEADLINE
Last day to meet and confer re: initial disclosures, early settlement, ADR process selection and discovery plan	9/11/2007	1/22/2008
Last day to file Joint ADR Certification with Stipulation to ADR Process or Notice of Need for ADR Phone	9/11/2007	1/22/2008

Conference		
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement	9/25/2007	2/5/2008
Initial Case Management Conference	10/2/2007 (2:00 p.m., Ctrm 5, 4 th floor)	2/12/2008 (2:00 p.m., Ctrm 5, 4 th floor)

Dated: September 5, 2007

ARNOLD & PORTER LLP

By: /S/
ANGEL L. TANG
Attorneys for Defendants
VeriSign, Inc. and m-Qube, Inc.

Dated: September 5, 2007

AUDET & PARTNERS, LLP

By: /S/
WILLIAM M. AUDET
Attorneys for Plaintiff Babak Pishvae

ORDER

Based upon the foregoing Stipulation of the parties, and good cause appearing therefor,
IT IS SO ORDERED.

DATED: _____

PATRICIA V. TRUMBULL
U.S. MAGISTRATE JUDGE